U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Plate-Rite Plating Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #2**
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Plate-Rite Plating Site
B5YL
Dayton, OH
Latitude: 39.8476384 Longitude: -84.2173403

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From: Steven Renninger, On-Scene Coordinator
Date: 11/22/2010
Reporting Period: October 27 through November 19, 2010

1. Introduction

1.1 Background

Site Number:	B5YL	**Contract Number:**	EP-S5-08-02
D.O. Number:	EP-G105-00064	**Action Memo Date:**	9/23/2010
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/18/2010	**Start Date:**	10/18/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	Ohio EPA notified
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Plate-Rite (PR) Plating Site includes one 13,000-square-foot building in Dayton, Ohio. The Site is located
mixed residential, commercial, and industrial area. The Site is bordered to the north by a residential property, t
south by a commercial building, to the east by a residential property and Webster Street, and to the west by a v

area. The Site is located within 200 feet of residential areas and within 500 feet of commercial businesses. Th is also located approximately 1.5 miles north of the Great Miami River.

The on-site building containers numerous plating tanks, pits, 55-gallon drums, containers and laboratory chemi containing hazardous wastes.

1.1.2.1 Location

The PR Plating Site is located at 5311 Webster Street in Dayton, Montgomery County, Ohio. The Site's geogra coordinates are 39° 49' 2.28" North latitude and 84° 10' 51.996" West longitude.

1.1.2.2 Description of Threat

Electroplating operations began at the PR Plating Site in 1985 and ceased in 2007. Bohn-Jur, Co., is the curre owner.

In February 1985, the Plate-Rite Co., Inc., began plating operations at the Site and provided product to industries such as the medical, food service, appliance, automotive, and tool room industries. The co electroplated a host of surfaces, including aluminum, cast iron, carbon steel, stainless steel, brass, copper, a castings. The company also worked with plating finishes that included copper, multi-layer nickel, zincating, dec chrome, polished nickel chrome, nickel plate satin finish. On August 3, 2005, the company voluntarily dis

In December 2005, Master Vision Plating, LLC (MV), was formed. MV leased the Site from the Bohn-Jur, C conducted electroplating operations until

On June 1, 2010, the Harrison Township Fire Department (HTFD) conducted a fire safety inspection at the building. The HTFD found numerous fire code violations and also observed the following:

- 21 plating tanks (approximately 1,000 gallons each) with liquids and solids;
- Three underground storage pits;
- 150 to 200 containers, most containing cyanides, acids, nickel, copper, and alkalines;
- One pallet of flammable material (paints);
- A laboratory with numerous small containers of chemicals;
- Spillage between tanks in the dip tank room; and
- Leaking 55-gallon drums.
-

The HTFD stated that since 2007, local authorities have had to respond to reports of breaking and entering of t on eight different occasions. The most recent break-in occurred the weekend of July 17,

On June 18, 2010, the HTFD submitted a letter to U.S. EPA requesting assistance in conducting a time removal action at the Site.

On July 22, 2010, U.S. EPA conducted a site assessment at the PR Plating Site.

On August 17, 2010, the Ohio Environmental Protection Agency (OEPA) requested assistance from the U.S. conducting a potential time-critical removal action involving numerous abandoned plating tanks, drum containers of plating waste at the

1.1.3 Preliminary Removal Assessment/Removal Site Inspection F

On July 22, 2010, U.S. EPA conducted a site assessment at the PR Plating Site and observe documented the presence of approximately 21 plating tanks, three underground storage pits, a labo and approximately 200 55-gallon drums and small containers of liquid and solid wastes located thro the on-site building. U.S. EPA collected 15 investigative liquid waste and 4 investigative solid samples from plating tanks, 55-gallon drums, containers, and the floor of the building. Based on ana results for the samples collected during the site assessment, the drums and containers contain cor caustic, and flammable liquids, and the plating tanks and drums contain TCLP arsenic (D004), cadmium (D006), TCLP chromium (D007), TCLP lead (D008), and cyanide-bearing toxic v

Hazardous wastes identified at the Site exhibited the following characte

- Ignit
- Corr
- Reactivity;
- Tc

Based on the analytical results and Site conditions observed during the site assessment, the Site me criteria for a removal action pursuant to 40 CFR 300.415(b)(2).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On September 9, 2010, the Emergency Contingency Plan was finalized by U.S. EPA and distributed t HTFD.

On September 23, 2010, the Action Memorandum was signed by the Director of the U.S. EPA Regior Superfund Division approving the removal action at the PR Plating Site.

On September 30, 2010, a delivery order was issued to the ERRS contractor (EQM) to conduct remov activities at the site.

On October 25, 2010, U.S. EPA initiated removal activities at the site.

2.1.2 Response Actions to Date

Week of October 25, 2010

ERRS completed sampling all plating tanks, drums, containers and pits. Approximately 270 containe were sampled in Level B PPE. AreaRAE units (equiped with hydrogen cyanide sensors) were utilizec inside the building to monitor air levels.

ERRS collected and staged all small containers (less than 5-gallons) and laboratory chemicals for futu segregation and lab packing.

START initiated hazard categorizing (hazcatting) the sampled containers. Hazcatting is being conduc inside the building using a ventilation hood. An example of the hazcatting tests being conducted on th samples include water and hexane solubility, pH, reactivity, oxidizer, flammability, cyanide, peroxide chrome testing.

ERRS conducted general cleanup activities at the site. Non-hazardous (non-haz) debris being loaded i rolloff boxes for off-site disposal. Two non-haz debris rolloff boxes were shipped for offsite disposal Stony Hollow Landfill, Dayton, Ohio.

The following cylinders were picked up for disposal by Weiler, Dayton, OH: one hydrogen cylinder, t oxygen cylinders and one small cylinder of mapp gas.

Ferrell Gas was on site and picked up five propane tank cylinders.

Members from the Harrison Township Fire Department conducted site visits over three days to view t and to become familiar with the on-site chemicals and hazards if an emergency was to occur.

Week of November 1, 2010

START completed hazcatting all samples. START completed entering hazcat and sample log data int DrumTrak program. The DrumTrak program will enable U.S. EPA to manage and estimate volumes identified wastestreams on site.

U.S. EPA, START and ERRS agreed to the various site wastestreams and the bulking strategy for the disposal samples. ERRS completed color-coding all of the plating tanks, drums and containers with it respective wastestream color designation. Representative composite wastestream samples for laborat analysis were prepared. The composite wastestream samples were picked up by the local commercial laboratory for analysis to initiate waste profiling.

START collected a composite soil sample from the western portion of the property. The soil sample collected to determine if metals contamination is located outside of the western portion of the facility.

Oil samples from two rectangular transformers were sent for PCB analysis. Hazcat analysis revealed probability of PCBs, so representative samples were sent to a commercial laboratory for verification.

ERRS conducted general cleanup activities at the site. Non-hazardous (non-haz) debris being loaded i rolloff boxes for off-site disposal. Five non-haz debris rolloff boxes were shipped for offsite disposal Stony Hollow Landfill, Dayton, Ohio. ERRS began loading non-haz metal into a scrap rolloff box for recycling.

Week of November 8, 2010

ERRS began bulking all chromic acid liquid containers into a large temporary storage tank. The estim volume of chromic acid (oxidizer) liquid is 3,500 gallons.

ERRS began bulking all neutral pH liquid containers into a large temporary storage tank. The estimat volume of neutral pH (pH reading between 4 through 10) liquid is 2,750 gallons.

ERRS completed sending out a request for qualification statement to companies to bid on lab packing lab chemicals on site. Lab chemicals on site include hydrogen peroxide, ammonium hydroxide, hydrofluoric acid, potassium permanganate, barium chloride, silver nitrate, ammonia, barium nitrate, sodium peroxide grain, batteries and aerosol cans.

ERRS completed bulking all dry cyanide solids into three poly 55-gallon drums.

ERRS completed bulking all flammable liquids and oil into one steel 55-gallon drum.

ERRS completed staging and grouping all containers into its respective wastestreams in preparation fo future bulking.

Week of November 15, 2010

ERRS completed bulking and transferring the following wastestreams (in Level B PPE) into each resp Baker storage tank:

- Chromic Acid Liquid - approximately 5,000 gallons into one Baker storage tank
- Neutral pH Liquid - approximately 5,000 gallons into two Baker storage tanks
- Acid Liquid - approximately 2,500 gallons into one Baker storage tank
- Caustic Liquid - approximately 1,000 gallons into one Baker storage tank

On November 15, 2010, one 20-cubic yard rolloff box of hazardous debris was shipped for off-site dis to Heritage Environmental Services, Indianapolis, Indiana.

On November 16, 2010, two drums of ammonium hydrogendifluoride and one drum of boric acid (sol were shipped for off-site disposal to Petro-Chem Processing Group, Detroit, Michigan.

On November 18, 2010, three drums of pure cyanide solids were shipped for off-site disposal to EQ D Inc, Detroit, Michigan.

On November 19, 2010, EQ Industrial Lab Packing Services were on-site and lab packed for off-site disposal all of the lab chemicals and small containers. Examples of the lab packed chemicals include: hydrofluoric acid, ammonium hydroxide, barium chloride, silver nitrate, ammonia solution, hydrogen peroxide, sodium peroxide grain, barium nitrate, potassium permanganate, greases, paints, old batterie aerosol cans and sodium light bulbs.

ERRS continued to use chop saws to cut empty vats and drums as each were transferred and emptied i appropriate wastestream Baker storage tank.

ERRS began dismantling the plating process line by cutting piping and contaminated walkways. The removed and cut were placed into the hazardous debris rolloff box.

START conducted continuous air monitoring using an AreaRAE network within the facility building. AreaRAEs contain a hydrogen cyanide sensor.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fu removal action.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Non-haz debris	Solid	7 rolloff boxes	Various	Landfill	Stony Holl Landfill Dayton, OI
Ammonium Hydrogendifluoride	Solid	2 drums	007855221JJK	Treatment	Petro-Chen Processing Detroit, MI
Boric Acid	Solid	1 drum	007855221JJK	Treatment	Petro-Che Processing Detroit, MI
Hazardous Debris	Solid	1 rolloff box (20 yards)	000375676WAS	Landfill	Heritage Indianapoli
Cyanide Solids (pure)	Solid	3 drums	000149358JJK	Treatment	EQ Detroit Detroit, MI
Lab Packing	Solids and Liquids	11 containers	007202060JJK 007202055JJK 007202054JJK	Treatment	EQ Lab Packing Services Indianapoli

2.2 Planning Section

2.2.1 Anticipated Activities

U.S. EPA will conduct the following activities:

1. Develop and implement a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency

Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Inventory and perform hazard characterization on all substances contained in containers, drums, vats, and tanks;
4. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site dispos
5. Dismantle and decontaminate process equipment, vats, tanks and building components associated with the plating are necessary; and
6. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C § 300.440).

2.2.1.1 Planned Response Activities

See Section 2.2.1.2.

2.2.1.2 Next Steps

No on-site work scheduled for November 22 - December 1, 2010. Site security will remain on-site du this time frame. The next steps will continue on December 2, 2010:

1. Continue general cleanup activities.
2. Bid out wastestreams for disposal and generate waste profiles.
3. Bulk cyanide liquid wastestream into a storage tank.
4. Dismantle plating process equipment.
5. Cut up plating vats and tanks.
6. Conduct off-site disposal of waste on site.
7. Continue air monitoring during removal activities.
8. Continue off-shift security.

2.2.2 Issues

1) Site hours are Monday through Friday, 0700 to 1800 hours (resuming December 2).
2) Site Security is being conducted during non-working hours.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaini
Extramural Costs				
ERRS - Cleanup Contractor	$300,000.00	$108,000.00	$192,000.00	64.0(
TAT/START	$25,000.00	$17,000.00	$8,000.00	32.0(
Intramural Costs				

USEPA - Direct	$20,000.00	$8,000.00	$12,000.00	60.0(
Total Site Costs	$345,000.00	$133,000.00	$212,000.00	61.4

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time report was written. The OSC does not necessarily receive specific figures on final payments made to a contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

On October 21, 2010, the Site H&S Plan was finalized.

On October 25, 2010, all site personnel read and signed the approved H&S Plan.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

Harrison Township Fire Department - Mark Lynch

Ohio EPA DERR - Dave Combs

4. Personnel On Site

U.S. EPA -- 1 OSC
START -- 1 WESTON START
ERRS -- 3 EQM and 3 Inland Waters of Ohio

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information such as a copy of "U.S. EPA's Site Assessment Report" or the "Emergency

Contingency Plan", please refer to the "Documents" Section of the project website http://www.epaosc

6.2 Reporting Schedule

The next POLREP will be issued in January 2011.

7. Situational Reference Materials